

"WISPs need unlicensed use of the 3.6 GHz band to provide adequate wireless broadband to both urban and rural customers. I request that the frequencies discussed in this NPRM made available for outdoor use only by wireless broadband providers."

- \* Indoor wireless signals from consumer equipment used in residences and businesses are raising the noise floor on existing Part 15 bands, rendering them useless for "last mile" broadband;

- \* Customers often unknowingly operate indoor and outdoor equipment on the same frequencies, causing self-interference;

- \* Current EIRP limitations in the 900 MHz, 2.4 GHz, and 5.8 GHz bands limit the range of wireless broadband access points, making them uneconomical to deploy in sparsely populated areas;

- \* There is already precedent for limiting frequencies to indoor use in the current Part 15 regulations; it is equally appropriate to limit frequencies to outdoor use to prevent interference;

- \* No one has claimed -- in this proceeding or elsewhere -- that there is a shortage of spectrum for consumer devices that are typically used indoors;

- \* If the FCC is to claim that wireless broadband represents effective intermodal competition for DSL and cable modem service, more spectrum and greater operating ranges are required.